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August 3, 2017

Via ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Choice Wireless, LLC
E911 Location Accuracy Implementation Plan and Progress Report
PS Docket No. 07-114

Dear Ms. Dortch,

Pursuant to 47 C.F.R. § 20.18(i)(4)(i)-(ii), submitted herewith on behalf of Choice Wireless, LLC, is its E911 location accuracy implementation plan and progress report.

Should you have any questions, please contact undersigned counsel.

Sincerely,

/s/ Michael R. Bennet

Michael R. Bennet

Attachment

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

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Wireless E911 Location Accuracy Requirements)

PS Docket No. 07-114

Choice Wireless, LLC E911 Implementation Plan and Initial Progress Report

Choice Wireless, LLC ("Choice"), pursuant to Section 20.18(i)(4)(i)-(ii) of the Federal Communications Commission's ("FCC" or "Commission") rules, hereby submits its location accuracy implementation plan and initial progress report.

Choice is a small non-nationwide CMRS carrier providing service to retail customers in Archer County, Texas. Choice does not provide service in any of the top 50 CMAs. Choice currently provides Phase I E911 service. Because Choice operates a single cell site, it is unable to triangulate, and is therefore unable to provide location data in accordance with Section 20.18(i). In a separate filing, Choice will be requesting a waiver of Section 20.18(i).

Choice has initiated an upgrade of its network to 3G/4G which it plans to complete by the end of the first quarter of 2018. Pursuant to that upgrade, Choice will be buildout out an additional three cell sites, which upon completion will allow it to triangulate signals and employ its chosen network-based E911 solution. Choice is in discussions with Airspan Networks and ZTE to provide base station equipment and contracted with Polaris Wireless to provide an E911 location data solution. When it completes its network upgrade and fully implements the Polaris E911 solution, Choice is optimistic that it will meet the current 40% benchmark set forth in Section 20.18(i)(2)(i)(B)(1). However, until its network upgrade is complete and its E911 solution implemented, Choice cannot determine definitively whether additional measures will be necessary to comply with the existing benchmark as well as applicable future horizontal location accuracy benchmarks. Choice plans on taking whatever measures are necessary to meet all such benchmarks. Choice does not currently plan to implement VoLTE so the benchmarks set forth in Sections 20.18(i)(2)(i)(B)(3)-(4) are likely to be inapplicable. Because Choice does not provide service in any of the top 50 CMAs, it is not required to provide vertical z-axis location information.


Nati Avner, Director

Date: August 2, 2017

